

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Criminal Case No. 23-cr-00252-DDD

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. ALEJANDRA YISSEL FLORES-CANACA, a/k/a "Aleeth";
2. EVELYN LUNA-SANCHEZ; and
3. AMANDA LEE LUNA,

Defendants.

INDICTMENT

The Grand Jury charges:

COUNT 1

From a date unknown but not later than May 12, 2022, until on or about January 20, 2023, in the State and District of Colorado, the defendants, ALEJANDRA YISSEL FLORES-CANACA, a/k/a "Aleeth"; EVELYN LUNA-SANCHEZ; AMANDA LEE LUNA; and others both known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate and agree, with interdependence, to distribute and possess with the intent to distribute 400 grams and more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A)(vi).

All in violation of Title 21, United States Code, Section 846.

COUNT 2

On or about May 12, 2022, in the State and District of Colorado, the defendants, ALEJANDRA YISSEL FLORES-CANACA, a/k/a “Aleeth”; and EVELYN LUNA-SANCHEZ, did knowingly and intentionally distribute and possess with intent to distribute 40 grams and more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B)(vi) and Title 18, United States Code, Section 2 (aiding and abetting).

COUNT 3

On or about June 23, 2022, in the State and District of Colorado, the defendants, EVELYN LUNA-SANCHEZ and AMANDA LEE LUNA, did knowingly and intentionally distribute and possess with intent to distribute 400 grams and more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A)(vi) and Title 18, United States Code, Section 2 (aiding and abetting).

COUNT 4

On or about January 11, 2023, in the State and District of Colorado, the defendants, ALEJANDRA YISSEL FLORES-CANACA, a/k/a “Aleeth”; and EVELYN LUNA SANCHEZ, did knowingly and intentionally distribute and possess with intent to distribute 40 grams and more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), a

Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B)(vi) and Title 18, United States Code, Section 2 (aiding and abetting).

Forfeiture Allegation

1. The allegations contained in Counts 1 through 4 of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 21, United States Code, section 853.

2. Upon conviction of the violations alleged in Counts 1 through 4 of this Indictment involving violations of Title 21, United States Code, Sections 841 and 846, defendants ALEJANDRA YISSEL FLORES-CANACA, a/k/a "Aleeth"; EVELYN LUNA-SANCHEZ; and AMANDA LEE LUNA shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853 any and all of the defendants' right, title, and interest in all property constituting and derived from any proceeds obtained directly and indirectly as a result of such offenses, and in all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offenses, including, but not limited to: a money judgment in the amount of proceeds obtained by the conspiracy and by the defendants.

Substitute Asset Provision

3. If any of the property described above, as a result of any act or omission of the defendants:

- a) cannot be located upon the exercise of due diligence;
- b) has been transferred or sold to, or deposited with, a third party;
- c) has been placed beyond the jurisdiction of the Court;
- d) has been substantially diminished in value; or

- e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the forfeitable property.

A TRUE BILL:

Ink signature on file in Clerk's Office
FOREPERSON

COLE FINEGAN
United States Attorney

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Alyssa Christine Mance
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DEFENDANT: ALEJANDRA YISSEL FLORES-CANACA, a/k/a "Aleeth"

AGE/YOB: 1997

COMPLAINT
FILED? _____ Yes _____x_____ No

If Yes, MAGISTRATE CASE NUMBER _____

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? ___ Yes ___ No

OFFENSE(S): Count 1: 21 U.S.C. § 846, conspiracy to possess with intent to distribute and distribute more than 400 grams of fentanyl, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(vi)

Count 2: 21 U.S.C. § 841(a)(1), (b)(1)(B)(vi); 18 U.S.C. § 2; possession with intent to distribute and distribute more than 40 grams of fentanyl, aiding and abetting the same

Count 4: 21 U.S.C. § 841(a)(1), (b)(1)(B)(vi); 18 U.S.C. § 2; possession with intent to distribute and distribute more than 40 grams of fentanyl, aiding and abetting the same

LOCATION OF
OFFENSE: Denver, Colorado

PENALTY: Count 1: NLT 10 years' imprisonment, NMT life imprisonment; NMT \$10,000,000 fine, or both; NLT 5 years' supervised release, NMT life supervised release; \$100 special assessment fee.

Counts 2, 4 (each count): NLT 5 years' imprisonment, NMT 40 years' imprisonment; NMT \$5,000,000 fine, or both; NLT 4 years' supervised release, NMT life supervised release; \$100 special assessment fee

AGENT: Zachary Romberger
Task Force Officer, DEA

AUTHORIZED
BY: Alyssa Christine Mance
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL:

x five days or less; ___ over five days

THE GOVERNMENT

x will seek detention in this case based on 18 U.S.C. § 3142(f)(1), (2)

The statutory presumption of detention is applicable to this defendant.

DEFENDANT: EVELYN LUNA-SANCHEZ

AGE/YOB: 2002

COMPLAINT _____ Yes _____x_____ No
FILED?

If Yes, MAGISTRATE CASE NUMBER _____

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? ___ Yes ___ No

OFFENSE(S): Count 1: 21 U.S.C. § 846, conspiracy to possess with intent to distribute and distribute more than 400 grams of fentanyl, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(vi)

Count 2: 21 U.S.C. § 841(a)(1), (b)(1)(B)(vi); 18 U.S.C. § 2; possession with intent to distribute and distribute more than 40 grams of fentanyl, aiding and abetting the same

Count 3: 21 U.S.C. § 841(a)(1), (b)(1)(A)(vi); 18 U.S.C. § 2; possession with intent to distribute more than 400 grams of fentanyl, aiding and abetting the same

Count 4: 21 U.S.C. § 841(a)(1), (b)(1)(B)(vi); 18 U.S.C. § 2; possession with intent to distribute and distribute more than 40 grams of fentanyl, aiding and abetting the same

LOCATION OF Denver, Colorado
OFFENSE:

PENALTY: Counts 1, 3 (each count): NLT 10 years' imprisonment, NMT life imprisonment; NMT \$10,000,000 fine, or both; NLT 5 years' supervised release, NMT life supervised release; \$100 special assessment fee.

Counts 2, 4 (each count): NLT 5 years' imprisonment, NMT 40 years' imprisonment; NMT \$5,000,000 fine, or both; NLT 4 years' supervised release, NMT life supervised release; \$100 special assessment fee

AGENT: Zachary Romberger
Task Force Officer, DEA

AUTHORIZED Alyssa Christine Mance
BY: Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL:

 x five days or less; over five days

THE GOVERNMENT

 x will seek detention in this case based on 18 U.S.C. § 3142(f)(1), (2)

The statutory presumption of detention is applicable to this defendant.

DEFENDANT: AMANDA LEE LUNA

AGE/YOB: 1983

COMPLAINT
FILED? _____ Yes _____x_____ No

If Yes, MAGISTRATE CASE NUMBER _____

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? ___ Yes ___ No

OFFENSE(S): Count 1: 21 U.S.C. § 846, conspiracy to possess with intent to distribute and distribute more than 400 grams of fentanyl, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(vi)

Count 3: 21 U.S.C. § 841(a)(1), (b)(1)(A)(vi); 18 U.S.C. § 2; possession with intent to distribute more than 400 grams of fentanyl, aiding and abetting the same

LOCATION OF
OFFENSE: Denver, Colorado

PENALTY: Count 1, 3 (each count): NLT 10 years' imprisonment, NMT life imprisonment; NMT \$10,000,000 fine, or both; NLT 5 years' supervised release, NMT life supervised release; \$100 special assessment fee.

AGENT: Zachary Romberger
Task Force Officer, DEA

AUTHORIZED
BY: Alyssa Christine Mance
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL:

x five days or less; _____ over five days

THE GOVERNMENT

x will seek detention in this case based on 18 U.S.C. § 3142(f)(1), (2)

The statutory presumption of detention is applicable to this defendant.